

## Alpek's Economic Sanctions Policy

### 1. BACKGROUND

Alpek S.A.B. de C.V., together with its subsidiaries and affiliates (collectively, "Alpek" or the "Company"), is committed to conducting its business in accordance with high ethical standards and to comply with all laws, rules, regulations, and other obligations (collectively, "Laws") applicable to the Company in the locations where it operates in accordance with its Code of Ethics. As part of that commitment, Alpek requires compliance with this Economic Sanctions Policy (the "Policy") by (1) all of its directors, officers, and employees, and (2) all of its agents, consultants, contractors, distributors, sales representatives, and other third parties acting for or on behalf of Alpek (collectively, "Agents").

### 2. OVERVIEW OF POLICY AND PURPOSE

Several countries in which Alpek operates impose restrictions on business dealings with certain other countries, governments, companies, or individuals due to national security, law enforcement, or foreign policy concerns. A failure to comply with these economic sanctions Laws may result in severe civil or even criminal penalties for the Company or its directors, officers, employees, or Agents. Alpek has put this Economic Sanctions Policy in place to ensure that it complies with all applicable restrictions.

This Policy uses, as its frame of reference, the economic sanctions Laws of the United States, which are among the most detailed in the world; however, Alpek must also comply with the other sanctions Laws applicable to it and its owned or controlled entities in the other jurisdictions where it operates. Although some Alpek entities are not U.S. companies, Alpek has substantial U.S. operations and deals in U.S.-origin products, which can extend the reach of U.S. jurisdiction to its non-U.S. operations. The Company also employs a number of persons who are U.S. citizens or U.S. permanent residents (i.e., green card holders) and therefore must comply with U.S. sanctions Laws regardless of whether they are living inside or outside the United States. Additionally, even Alpek employees who are not U.S. nationals but who are posted in the United States must comply with U.S. law while they are in the United States. For these reasons, Alpek has determined that it is appropriate to frame this Policy by reference to U.S. law.

U.S. sanctions Laws are implemented primarily by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"), as well as by other U.S. government agencies, including the U.S. State Department's Office of Terrorism Finance & Economic Sanction Policy. These Laws prohibit a broad range of commercial and financial transactions involving certain countries and governments; individuals and entities organized, located, or resident in sanctioned countries; as well as specifically targeted entities and individuals regardless of where they are located. Sanctioned persons that are specifically targeted (including governments, entities, and individuals) are identified on lists, including the Specially Designated Nationals and Blocked Persons list, the Foreign Sanctions Evaders list, the Sectoral Sanctions Identifications list, and other U.S. and international sanctions lists. Entities owned or controlled, directly or indirectly, by listed individuals and entities are subject to sanctions. In this Policy, listed persons (including governments, entities, and individuals) and entities owned or controlled by listed persons are referred to collectively as "Sanctioned Entities."

In general, all transactions with or in sanctioned countries or regions or with Sanctioned Entities are prohibited by this Policy. Unless as specified in this document, the exception to this prohibition is a transaction that Alpek's Legal Department (referred

to herein as “Alpek Legal”) in conjunction with Alpek or the corresponding Alpek subsidiary has reviewed and authorized in writing after determining that (i) it is not prohibited by economic sanctions Laws, or (ii) it is permitted on the basis of licenses or other authorizations issued by authorities administering each applicable sanctions regime (for example, a general license or specific license issued by OFAC). Engaging in prohibited transactions, including transactions subject to U.S. sanctions Laws that are not covered by an OFAC-issued general license or specific license, can result in substantial civil and even criminal penalties for Alpek and its directors, officers, and employees in their individual capacities and of its Agents. With these risks in mind, this Policy is designed to ensure compliance with all applicable sanctions Laws.

This Policy applies to all Alpek entities and their respective directors, officers, employees, and Agents (referred to herein as “You”). You must comply with the screening and other procedures discussed in this Policy, as well as any local policies and procedures issued in furtherance of this Policy, and You must obtain prior written approval from Alpek Legal before engaging in any transaction, directly or indirectly, with a Sanctioned Entity or with or in a sanctioned country or territory, unless as specified in this document. You also must obtain prior written approval from Alpek Legal before engaging in any transaction under any sanctions license or authorization, including an OFAC general license or specific license, unless specified in this document. This Policy covers any business activities relating to transactions or planned transactions with Alpek, directly or indirectly, including without limitation those involving the Company’s prospective and actual customers, suppliers, and other counterparties (collectively, “Business Partners”). Violations of this Policy will result in disciplinary action, up to and including termination.

### **3. U.S. ECONOMIC SANCTIONS**

Because this Policy uses U.S. economic sanctions Laws as its frame of reference, it is important to understand several basic points about how those Laws work.

U.S. economic sanctions operate by prohibiting U.S. persons from engaging in commercial and/or financial transactions with various countries and Sanctioned Entities. The term “U.S. persons” includes: (1) U.S. citizens and permanent residents (green card holders), no matter where they are located; (2) corporations and other entities established under the Laws of the United States or any U.S. jurisdiction; and (3) foreign persons, entities, and corporations located inside the United States. In certain cases, U.S. sanctions also may apply to various non-U.S. persons on an extraterritorial basis, for example, when non-U.S. persons are handling U.S.-origin goods subject to U.S. export controls. U.S. sanctions with respect to Cuba and Iran expressly restrict the activities of non-U.S. entities owned or controlled by U.S. persons to the same extent as they restrict the activities of U.S. persons.

Most sanctions programs prohibit U.S. persons from engaging in any dealings with or in sanctioned countries or regions or involving the property or interests in property of Sanctioned Entities (see Appendix C attached hereto for the OFAC Targeted Countries as of September 1st, 2020). OFAC defines the term “property” broadly to include nearly anything of value, such as goods, services, or money. The term “interest in property” is equally broad, covering securities, contracts, and even agreements that may be contingent on the future suspension of U.S. sanctions.

#### **Country-Based Sanctions**

As of this date the United States maintains nearly comprehensive territorial sanctions against Cuba, Iran, North Korea, Syria, the so-called Donetsk People’s Republic (DNR), Luhansk People’s Republic (LNR) and the Crimea regions of Ukraine as well as significant sanctions against Russia and Venezuela. Most commercial and financial dealings with persons in these countries

or regions are prohibited (as are dealings with their respective governments). Accordingly, You may not engage in any transactions with these countries, their governments, or any persons located in these countries, without prior permission from Alpek Legal, unless as specified in this document. This list will be updated on a regular basis, depending on additional sanctions imposed to some other countries.

#### **List-Based Sanctions Pertaining to Foreign Governments**

In addition to territorial sanctions, the United States imposes list-based sanctions on current and former governments of certain countries. Countries where such programs currently apply include Belarus, Burma, the Democratic Republic of Congo, Iraq, Ivory Coast (Cote D'Ivoire), Liberia, Libya, Russia, Somalia, Ukraine, Venezuela, Yemen, and Zimbabwe. Although these sanctions do not prohibit all dealings with or in these countries, such dealings carry a heightened risk of carrying out prohibited transactions with Sanctioned Entities. For this reason, You may not undertake dealings with persons in these countries (including prospective and actual Agents and Business Partners) without first: (1) screening (by a reputable third party screening services provider previously approved by Alpek Legal) all involved parties and intermediaries against OFAC's lists of Sanctioned Entities; and (2) obtaining prior written authorization from Alpek Legal, unless as specified in this document.

#### **List-Based Sanctions Pertaining to Activities of Concern**

The United States also maintains sanctions programs that are not linked to a particular country or region but target Sanctioned Entities involved in activities that undermine U.S. foreign policy objectives and/or threaten U.S. national security. Examples include terrorist syndicates, narcotics traffickers, weapons proliferators, human rights violators, and criminal organizations.

You must contact the Exports Control area of your corresponding affiliate or subsidiary, or in the absence thereof a reputable third-party screening services provider previously approved by Alpek Legal for them to screen prospective Agents and Business Partners against OFAC's lists of Sanctioned Entities before engaging in business activities with such Agents and Business Partners. A consolidated U.S. sanction screening list is available at the following web address: <https://www.export.gov/csl-search>

You may not engage in any transaction with a prospective Agent or Business Partner that is on such a list without prior written authorization from Alpek Legal, unless as specified in this document.

The procedures to screen Agents and Business Partners, reports and the corresponding approvals under this policy, will be developed and agreed between Alpek and its subsidiaries, with Alpek Legal and Internal Audit department's input and involvement which will be attached to this policy as Appendix E, in any case, all Business Partners and Agents, must be screened before entering into any transaction or dealing with them, furthermore such Business Partners and Agents must be screened from time to time to ensure compliance with the terms of this policy.

#### **Extraterritorial Sanctions**

In addition to the programs described above, the United States maintains programs designed to deter non-U.S. companies from doing business with sanctioned countries and Sanctioned Entities. Unlike sanctions programs addressed to the conduct

of U.S. persons, these extraterritorial sanctions, or “secondary sanctions,” are addressed to the conduct of non-U.S. persons occurring outside of U.S. jurisdiction. While they do not prohibit such conduct (except, as noted above, in the case of sanctions on Cuba and Iran as applied to non-U.S. entities owned or controlled by U.S. persons), they make it more difficult for persons who engage in such conduct to access the U.S. market. These extraterritorial sanctions are complex and change frequently.

The existence of these secondary sanctions programs reinforces the importance of Alpek’s adherence to the requirements described in the preceding sections of this Policy.

#### **4. LICENSING**

Alpek Legal may approve a transaction with a Sanctioned Entity or with or in a sanctioned country or region, after determining that no applicable sanctions regime prohibits the proposed transaction or that the proposed transaction is licensed or authorized by all relevant authorities (for example, by a general license or a specific license issued by OFAC). Because U.S. sanctions programs are complicated and change frequently, Alpek Legal maintains more detailed guidance regarding licenses and other recurring compliance issues. When sanctions-related issues arise, it is Your responsibility to review and comply with this Policy and to seek appropriate guidance from Alpek Legal.

In addition to these requirements, You shall strictly observe any terms, conditions, or limitations established by any licenses that apply to Alpek, as determined by Alpek Legal. Questions regarding compliance with any OFAC license should be directed to Alpek Legal.

#### **5. RESPONSIBILITY FOR POLICY AND PERIODIC REVIEW**

Alpek Legal and Internal Audit are assigned overall authority over this Policy; however, every director, officer, employee, and Agent of Alpek and its subsidiaries, has the specific responsibility to: (i) screen its Business Partners and Agents (using an approved services within the terms of this policy); (ii) enforce and comply with the Policy and; (iii) be alert and report to potential violations by others. Alpek Legal has assigned the review and preliminary authorization in writing of specific transactions of certain subsidiaries or affiliates covered by this policy to the legal and compliance departments overseeing the operations of such specific subsidiaries or affiliates as stated in Appendix D, however such legal and compliance departments must always give notice to and receive authorization from Alpek Legal to ultimately engage in any transaction with Sanctioned Entities.

Alpek through Alpek Legal, Internal Audit, and its Compliance department and any other applicable areas, shall ensure that (i) the Company undertakes periodic risk assessments in relation to each business area and country in which the Company operates and (ii) the Policy is reviewed and evaluated on an annual basis, or more frequently if necessary, to ensure that it is aligned with and address those risks.

#### **6. TRAINING**

Alpek recognizes the importance of providing training to directors, officers, and employees based on the compliance risks associated with their job functions, for example, shipping, logistics, and interactions with Agents and Business Partners. Alpek will provide and You are required to undertake appropriate training regarding the Policy if Your job responsibilities include these types of activities. In addition, when requested, directors, officers, employees, and Agents will be required to complete the Certification of Compliance attached hereto as Appendix A.

## 7. USE OF AGENTS

Alpek itself or through its subsidiaries occasionally engages Agents, as defined above to include agents, consultants, contractors, distributors, sales representatives, and other third parties acting for or on behalf of Alpek. It is vitally important that Alpek have a complete understanding of who these Agents are and what they are doing on the Company's behalf. Agents also must understand that they are required to comply with this Economic Sanctions Policy.

Before entering into an agreement with an Agent, appropriate "due diligence" must be conducted. This typically should include collecting information about the potential Agent to determine if the Agent is qualified for the position, whether the Agent is or is owned or controlled by any sanctioned individual or entity or conducts business in any sanctioned country or region, the number and reputation of the Agent's clientele, and the Agent's reputation with clients and business associates.

Every agreement with an Agent must be in writing and approved in advance in writing by the Legal and Compliance departments overseeing the operations of the corresponding subsidiary or affiliate of Alpek. The agreement must clearly specify the services to be provided by the Agent and the terms of payment. The agreement also must contain provisions: (i) requiring that the Agent comply fully with the Company's Economic Sanctions Policy and all applicable Laws; (ii) affording Alpek appropriate monitoring and audit rights, including rights to access the Agent's books and records; (iii) prohibiting the Agent from conducting any business on the Company's behalf involving sanctioned countries or regions or sanctioned individuals or entities; and (iv) allowing Alpek to terminate the relationship in the event of non-compliance with any undertakings related to sanctions. Finally, the agreement should require that, at the time it is executed, and whenever otherwise requested by Alpek, the Agent will sign the Certification of Compliance attached hereto as Appendix A.

In Your interactions with Agents, You must be alert to and report to Your supervisor, Your legal and compliance departments, and Alpek Legal of any "red flags" or warning signs involving the Agent. Examples of "red flags" include unusual payment patterns or shipping arrangements, prior allegations or charges of product diversion or sanctions or export control violations, a refusal by the Agent to sign the Certification of Compliance, and lack of transparency in accounting records and shipping and end-customer and end-use documentation

## 8. COMPLIANCE CERTIFICATIONS

When requested, directors, officers, employees, and Agents will be required to complete the Certification of Compliance attached hereto as Appendix A.

## 9. RAISING QUESTIONS AND REPORTING CONCERNS

Any questions about this Policy or its application to any particular set of facts should be referred to Alpek Legal with copy to Alpek's Compliance department.

If You see or hear about a potential violation of this Policy by or involving a director, officer, employee, Agent, or Business Partner, You must not "close your eyes" to the issue. You must report the conduct immediately to Your supervisor or human resources representative, Your contact at the Company (for third parties), or directly to Alpek Legal. The Alpek Legal may be contacted at:

Jorge A. Garcia Garza  
Tel: +52 818-748-1384  
[jgarcía@alpek.com](mailto:jgarcía@alpek.com)



Jose Pablo Garza Santisteban  
Tel: +52 818-748-1242  
[jpgarza@alpek.com](mailto:jpgarza@alpek.com)

For information purposes only, in any communication, please copy Alpek's compliance department at:

Mauricio Coindreau Garza  
Tel: +52 818-748-1354  
[mcoindreau@alpek.com](mailto:mcoindreau@alpek.com)

If, for any reason, You are uncomfortable speaking about Your concerns with any of the persons set forth above, You may communicate Your concerns on an anonymous basis by calling the hotline at <https://www.alfa.com.mx/CONT/transparency.htm>. You may also find the telephone numbers by country attached hereto as Appendix B.

All potential violations reported through the Company hotline or by any other means, will be referred to Alpek Legal and handled as described below.

#### **10. ANTI-RETALIATION**

Alpek will not tolerate retaliation against anyone who in good faith raises concerns about possible violations of this Policy or applicable Laws, and no adverse employment action will be taken against You for such reports.

#### **11. RESPONDING TO REPORTS OF VIOLATIONS**

When Alpek receives information regarding a possible violation of this Policy or applicable Laws, it will undertake a review of the matter in a manner that is appropriate based on the nature of the possible violation, the source and nature of the information concerning the possible violation, and the identity and position of the person(s) who may have been involved in the possible violation. If necessary, Alpek also may engage outside experts and consultants to assist and advise it in reviewing and responding to the reported violations. You are expected to cooperate with any such internal review or investigation. At the conclusion of its review of any reported violation of this Policy or applicable Laws, Alpek will take appropriate action, if necessary, including disciplining responsible individuals and modifying internal policies and procedures to prevent a recurrence of similar misconduct.

#### **12. DISCIPLINARY ACTION FOR FAILURE TO COMPLY**

All Alpek directors, officers, and employees who fail to comply with Company Policies or applicable Laws will be subject to disciplinary action, up to and including dismissal.

## Appendix A

### Alpek Certification of Compliance

I acknowledge that I have reviewed Alpek's Code of Ethics and Economic Sanctions Policy. I understand that I have an obligation to fully adhere to these policies and principles. In particular, I acknowledge and affirm that:

I am not the target of any economic sanctions or located in any sanctioned country or region, and that, in carrying out my responsibilities on behalf of Alpek, I agree that I have not, will not, and will ensure that no person acting on my behalf or at my direction will, engage in any dealings with any sanctioned individuals or entities or with or in sanctioned countries or regions.

I also certify that I have no knowledge that anyone acting on my behalf or at my direction, or on Alpek's behalf or at Alpek's direction, has engaged or is engaging in such activities.

I understand that Alpek may terminate its relationship with me if I fail to follow the requirements listed in this Certification of Compliance, Alpek's Code of Ethics and Economic Sanctions Policy, or in my agreement with Alpek.

By: \_\_\_\_\_  
[Name]

Date: \_\_\_\_\_

## Appendix B

### Integrity and Transparency Helpline

The following is a list of 1-800 toll free numbers (available 24/7) You can call depending on your country of residence:

Argentina:	<b>0800-444-5685</b>
Brasil:	<b>0800-892-2016</b>
Canada:	<b>1-866-238-2860</b>
Chile:	<b>800-914-378</b>
USA:	<b>1-866-482-1957</b>
Long distance:	<b>+52-818-748-2991</b>
Mexico:	<b>01-800-265-2532</b>

You can write and send your message by accessing the following link:

[Online Integrity and Transparency Helpline](#)

[https://www.alfa.com.mx/formas/forma\\_coment\\_eng.html](https://www.alfa.com.mx/formas/forma_coment_eng.html)

Or you can send an email to the following e-mail address: [transparency@alfa.com.mx](mailto:transparency@alfa.com.mx)



## Appendix C

### OFAC Targeted Countries as of September 12, 2024.

**PLEASE NOTE:** It is Your responsibility to always screen Business Partners and Agents (with the approved third-party screening service as specified in this policy) BEFORE engaging in any transaction.

For reference only, as of September 12, 2024, below is a list of active sanctions programs in the US:

Active Sanctions Programs	Program Last Updated
<a href="#">Afghanistan-Related Sanctions</a>	<a href="#">Feb 25, 2022</a>
<a href="#">Balkans-Related Sanctions</a>	<a href="#">Jun 18, 2024</a>
<a href="#">Belarus Sanctions</a>	<a href="#">Aug 09, 2024</a>
<a href="#">Burma-Related Sanctions</a>	<a href="#">Aug 20, 2024</a>
<a href="#">Central African Republic Sanctions</a>	<a href="#">Dec 08, 2023</a>
<a href="#">Chinese Military Companies Sanctions</a>	<a href="#">Jun 01, 2022</a>
<a href="#">Counter Narcotics Trafficking Sanctions</a>	<a href="#">Sep 10, 2024</a>
<a href="#">Counter Terrorism Sanctions</a>	<a href="#">Sep 11, 2024</a>
<a href="#">Countering America's Adversaries Through Sanctions Act-Related Sanctions</a>	<a href="#">Jul 18, 2024</a>
<a href="#">Cuba Sanctions</a>	<a href="#">Aug 27, 2024</a>
<a href="#">Cyber-Related Sanctions</a>	<a href="#">Jul 19, 2024</a>
<a href="#">Democratic Republic of the Congo-Related Sanctions</a>	<a href="#">Jul 25, 2024</a>
<a href="#">Ethiopia-Related Sanctions</a>	<a href="#">Feb 08, 2022</a>
<a href="#">Foreign Interference in a United States Election Sanctions</a>	<a href="#">Feb 02, 2024</a>
<a href="#">Global Magnitsky Sanctions</a>	<a href="#">Sep 12, 2024</a>
<a href="#">Hong Kong-Related Sanctions</a>	<a href="#">Dec 20, 2021</a>
<a href="#">Hostages and Wrongfully Detained U.S. Nationals Sanctions</a>	<a href="#">Apr 23, 2024</a>
<a href="#">Iran Sanctions</a>	<a href="#">Sep 10, 2024</a>
<a href="#">Iraq-Related Sanctions</a>	<a href="#">Aug 23, 2023</a>
<a href="#">Lebanon-Related Sanctions</a>	<a href="#">Aug 10, 2023</a>
<a href="#">Libya Sanctions</a>	<a href="#">Oct 17, 2022</a>
<a href="#">Magnitsky Sanctions</a>	<a href="#">Aug 17, 2023</a>
<a href="#">Mali-Related Sanctions</a>	<a href="#">Aug 04, 2023</a>
<a href="#">Nicaragua-related Sanctions</a>	<a href="#">May 15, 2024</a>
<a href="#">Non-Proliferation Sanctions</a>	<a href="#">Sep 12, 2024</a>
<a href="#">North Korea Sanctions</a>	<a href="#">Jul 24, 2024</a>
<a href="#">Rough Diamond Trade Controls</a>	<a href="#">Jun 18, 2018</a>
<a href="#">Russian Harmful Foreign Activities Sanctions</a>	<a href="#">Sep 10, 2024</a>
<a href="#">Somalia Sanctions</a>	<a href="#">May 24, 2023</a>
<a href="#">South Sudan-Related Sanctions</a>	<a href="#">Dec 08, 2023</a>

Active Sanctions Programs	Program Last Updated
<a href="#">Sudan and Darfur Sanctions</a>	<a href="#">Jun 06, 2024</a>
<a href="#">Syria Sanctions</a>	<a href="#">Jun 05, 2024</a>
<a href="#">Syria-Related Sanctions (Executive Order 13894 of 2019)</a>	<a href="#">Aug 17, 2023</a>
<a href="#">Transnational Criminal Organizations</a>	<a href="#">Jul 25, 2024</a>
<a href="#">Ukraine-/Russia-related Sanctions</a>	<a href="#">May 06, 2024</a>
<a href="#">Venezuela-Related Sanctions</a>	<a href="#">Sep 12, 2024</a>
<a href="#">West Bank-Related Sanctions</a>	<a href="#">Aug 28, 2024</a>
<a href="#">Yemen-related Sanctions</a>	<a href="#">Nov 18, 2021</a>

\*As shown in: “<https://ofac.treasury.gov/sanctions-programs-and-country-information>” as of **September 12, 2024**.

## Appendix D

**Subsidiaries and affiliates legal departments assigned with the review and preliminary authorization in writing of specific transactions of the subsidiaries or affiliates that they oversee.**

**1. Alpek Polyester USA LLC legal and/or compliance department:**

Contact Information:

Verónica Ramírez Briones

General Counsel

7621 Little Ave., Suite 500

Charlotte, NC 28226

USA

Tel.: +1-704-940-7576

[vramirez@alpekpolyester.com](mailto:vramirez@alpekpolyester.com)

**Alpek Polyester SA de CV legal and/or compliance department will review the following Alpek entities:**

- Alpek Polyester UK Ltd.
- Akra Polyester S.A. de C.V
- Alpek Polyester Brasil SA
- Alpek Polyester Pernambuco SACompagnie Alpek Polyester Canada
- Alpek Polyester USA LLC
- DAK Americas Exterior, S.L.
- Alpek Polyester Pearl River Inc
- Alpek Polyyster Mississippi Inc
- Alpek Polyester Argentina SAApek Polyester Mexico Mexico, S.A. de C.V.
- Ecopek, S.A. de C.V.
- Generadora Petrocel, S.A. de C.V.
- Grupo Petrotemex, S.A. de C.V.
- Inmobiliaria Petrocel, S.A. de C.V.
- Tereftalatos Mexicanos Gas, S.A. de C.V.
- Tereftalatos Mexicanos, S.A. de C.V.
- Octal Saudi Arabia Plant LLC
- Octal SAOC FZC

## Appendix E

### **Screening, reporting and approval Procedures**

In order to screen Business Partners and Agents, Alpek has reviewed multiple screening services providers and has approved the use of Thomson Reuters Corporation's Denied Party Screening service by Alpek and its subsidiaries to fulfill the commitments and obligations of this sanctions policy.

Therefore, Alpek's subsidiaries must enter into the Agreement with Thompson Reuters previously negotiated by Alpek as a group. If a specific subsidiary wants to hire a different service, it will need the approval of Alpek and Alpek Legal.

You have the responsibility to follow and implement the processes stipulated in Appendix E1, E2 and E3 internally to fulfill your obligations under this policy; however, You may choose to follow a different process as long as You are not in violation of this policy and receive approval from Alpek and Alpek Legal.

[APPENDIX E1, E2 and E3 follows]